

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In re Petition of	)	CSR-_____E
	)	
	)	<b>PSID Nos. 008466</b>
<b>Time Warner Cable Inc.</b>	)	
For Determination of	)	Bristol, Town of WI0763
Effective Competition	)	Silver Lake, Village of WI0623
	)	Twin Lakes, Village of WI1300

To: Chief, Media Bureau

**PETITION FOR SPECIAL RELIEF**

Time Warner Cable Inc. ("Time Warner Cable"), by its attorneys, and pursuant to Sections 76.7, 76.905(b) and 76.907 of the Commission's rules,<sup>1</sup> hereby petitions the Commission for a finding that Time Warner Cable's cable television system serving the above-captioned communities (unless otherwise noted, individually "Franchise Area" and collectively "Franchise Areas") is subject to effective competition<sup>2</sup> and therefore exempt from any rate regulation imposed pursuant to Section 623 of the Communications Act of 1934 (the "Act").<sup>3</sup>

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<sup>1</sup> 47 C.F.R. §§ 76.7, 76.905(b), 76.907.

<sup>2</sup> Pursuant to Section 76.910 of the Commission's rules, rate regulatory authority may be exercised only by a local franchising authority ("LFA") that has been properly certified. 47 C.F.R. § 76.910. To the extent that any political subdivision covered by this petition is an LFA and has been certified to regulate rates in accordance with the Commission's rules, Time Warner Cable respectfully requests that the Commission revoke such certification pursuant to Section 76.914(c). 47 C.F.R. § 76.914(c). To the extent that franchising responsibilities of any political subdivision covered by this petition have been reassigned to another governmental body, e.g., pursuant to legislation providing for state-issued franchises, then that political subdivision is no longer an LFA and obviously would no longer have rate regulatory authority. In such event, Time Warner Cable is nevertheless seeking an effective competition determination to achieve the full competitive flexibility associated therewith.

<sup>3</sup> 47 U.S.C. § 543. Time Warner Cable requests that, consistent with Commission precedent, any FCC grant of effective competition in the Franchise Areas be effective as of the date of filing of this petition. See, e.g., *Altrio Communications, Inc. v. Adelphia Communications Corporation*, 17 FCC Rcd 22955, ¶ 5 (Med. Bur. 2002) (Commission order released September 26, 2002 found that Adelphia was subject to effective competition in the Arcadia, California franchise area as of October 1, 2001).

## **I. TIME WARNER CABLE SATISFIES THE “50/15” OR “COMPETING PROVIDER TEST” IN THE FRANCHISE AREAS.**

Pursuant to Section 623(a)(2) of the Act,

[i]f the Commission finds that a cable system is subject to effective competition, the rates for the provision of cable service by such system shall not be subject to regulation by the Commission or by a State or franchising authority under this section.<sup>4</sup>

The Act further provides that a cable system will be considered subject to effective competition (and therefore exempt from rate regulation) under the “50/15” test if, *inter alia*, the franchise area is:

- (i) served by at least two unaffiliated multichannel video programming distributors each of which offers comparable video programming to at least 50 percent of the households in the franchise area; and
- (ii) the number of households subscribing to programming services offered by multichannel video programming distributors other than the largest multichannel video programming distributor exceeds 15 percent of the households in the franchise area.<sup>5</sup>

As demonstrated below, effective competition exists in the Franchise Areas because competing multichannel video programming distributors (“MVPDs”), including direct-to-home (“DTH”) satellite providers such as DirecTV<sup>6</sup> and DISH Network<sup>7</sup> (collectively the “DBS Providers”), are available to more than 50 percent, and are subscribed to by more than 15 percent, of the households in such areas.

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<sup>4</sup> 47 U.S.C. § 543(a)(2).

<sup>5</sup> 47 U.S.C. § 543(l)(1)(B); *see also* 47 C.F.R. § 76.905(b)(2).

<sup>6</sup> DirecTV is a registered trademark of DirecTV, Inc.

<sup>7</sup> DISH Network is a registered trademark of EchoStar Communications Corporation.

#### **A. Competing MVPD Services Are “Offered” in the Franchise Areas.**

According to the Commission’s rules, an MVPD’s service is deemed to be “offered” for purposes of effective competition:

- (1) When the multichannel video programming distributor is physically able to deliver service to potential subscribers, with the addition of no or only minimal additional investment by the distributor, in order for an individual subscriber to receive service; and (2) When no regulatory, technical or other impediments to households taking service exist, and potential subscribers in the franchise area are reasonably aware that they may purchase the services of the multichannel video programming distributor.<sup>8</sup>

As demonstrated below, the DBS providers “offer” service in the Franchise Areas under this definition.

##### **1. The DBS Providers are “Physically Able” to Offer Service to Subscribers in the Franchise Areas.**

The Commission has repeatedly determined that DBS service is technically available throughout the continental United States due to its nationwide satellite footprint.<sup>9</sup> Therefore, the DBS Providers are “physically able” to offer service to subscribers in the Franchise Areas.

##### **2. No Regulatory, Technical or Other Impediments to Households Taking the DBS Providers’ Services Exist.**

The DBS providers’ services are deemed to be technically available in a franchise area if the footprints of their satellites cover the franchise area and there are no local regulations prohibiting reception by home satellite dishes.<sup>10</sup> As noted above, DBS services have been determined by the Commission to be available throughout the United States. Time Warner Cable is aware of no zoning restrictions in the Franchise Areas that would prevent potential subscribers from placing a small dish on their houses or on their properties in order to receive

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<sup>8</sup>47 C.F.R. § 76.905(e).

<sup>9</sup> See, e.g., *Bright House Networks, LLC, Petition for Determination of Effective Competition*, Memorandum Opinion and Order, 22 FCC Rcd 4390, ¶ 6 (Med. Bur. 2007) (“Bright House Networks”).

<sup>10</sup>*Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation*, 8 FCC Rcd 5631, ¶ 32 (1993) (“Rate Order”).

DBS service. Indeed, it would appear that any such restriction would violate Section 207 of the Telecommunications Act of 1996 and Section 25.104 of the FCC's rules promulgated thereunder.<sup>11</sup> Further, the DBS providers do not need franchises to offer service to residents in the Franchise Areas. As such, there are no regulatory, technical or other impediments to households taking the DBS providers' service.

**3. Potential Subscribers in the Franchise Areas are "Reasonably Aware" That They May Purchase the DBS Providers' Services.**

In light of the Commission's prior findings regarding the ubiquitous availability of DBS service, and in recognition of the DBS Providers' extensive national, regional and local advertising and marketing efforts through television and radio, Internet, print media and direct marketing, potential subscribers throughout the Franchise Areas are undoubtedly "reasonably aware" of the availability of the DBS Providers' services.<sup>12</sup> In addition, the Commission has held that the DBS Providers' extensive nationwide subscribership and growth in recent years, combined with a local DTH penetration of more than 15 percent in any given franchise area, is an accurate sign that potential subscribers within that franchise area are "reasonably aware" of the availability of the DBS Providers' services.<sup>13</sup>

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<sup>11</sup>Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996); *see* 47 C.F.R. § 25.104.

<sup>12</sup> The DBS Providers maintain comprehensive websites, [www.dishnetwork.com](http://www.dishnetwork.com) and [www.directv.com](http://www.directv.com), where consumers can learn more about local retail outlets and how to buy the necessary equipment online or through a toll-free number. *See Rate Order* at n. 104 ("[W]e believe that regional or local marketing, such as by a national or regional 800 telephone number, would suffice."). *See also id.* at ¶ 29; *Adelphia Cable Communications*, 20 FCC Rcd 20487, ¶ 6 (Med. Bur. 2005) ("*Adelphia Effective Competition Order*") (There is "no reason to require needlessly fractionalized marketing in order to ensure that a national or regional programming service is available in a particular community... [P]otential subscribers may be made reasonably aware of the availability of a competing service... through advertising in regional or local media, direct mail, or *any other* marketing outlet" (citing *Rate Order* at ¶ 29) (emphasis in original)).

<sup>13</sup> Indeed, the Commission has "found households in a franchise area to be reasonably aware that they may purchase DBS service solely based on evidence of DBS's nationwide growth and local subscriptions, without reference to advertising or other promotion." *Bright House Networks* at ¶ 6 (referencing *Adelphia Communications, et al., Nineteen Unopposed Petitions for Determination of Effective Competition in Forty-Seven Local Franchise Areas*, Memorandum Opinion and Order, 20 FCC Rcd 7503, ¶ 3 (Med. Bur. 2005)).

Here, the presence of numerous subscribers of the DBS Providers' services in the Franchise Areas, as shown below, demonstrates that such individuals are all obviously aware of their ability to obtain service from a DBS Provider. Moreover, it is reasonable to assume the awareness of the availability of the DBS Providers' services only continues to increase as additional DBS dishes are prominently installed throughout the Franchise Areas.

Because the three factors described above have been satisfied, the DBS Providers "offer" competing MVPD services in the Franchise Areas.

#### **B. The DBS Providers Offer "Comparable Multichannel Video Programming."**

Effective competition exists where programming offered by an MVPD competitor is deemed "comparable" to the programming offered by the unaffiliated cable operator.<sup>14</sup> The programming offered by a competing MVPD is deemed "comparable" if it includes "at least 12 channels of video programming, including at least one channel of nonbroadcast service programming."<sup>15</sup> The Commission's decisions have repeatedly concluded that the DBS Providers satisfy § 76.905(g)'s comparable programming criterion.<sup>16</sup>

The programming offered by DirecTV and Dish Network, listings of which are available at [www.directv.com](http://www.directv.com) and [www.dishnetwork.com](http://www.dishnetwork.com),<sup>17</sup> includes many of the same popular

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<sup>14</sup> 47 U.S.C. § 543(l)(1)(B)(i).

<sup>15</sup> 47 C.F.R. § 76.905(g).

<sup>16</sup> See *ACC Cable Communications, FLA-VA, LLC*, 18 FCC Rcd 7110, ¶ 6 (Med. Bur. 2003) (Town of Lake Waccamaw and Town of Tabor City, North Carolina) ("...the Commission has repeatedly concluded that the programming of DBS providers, such as DIRECTV and Dish, satisfy the Commission's [comparable] programming criterion"); *Adelphia Effective Competition Order* at ¶ 7 ("Because different sets of rules govern which stations cable operators and DBS service providers can or must carry, we have never insisted on absolute parity in station offerings. Instead, an MVPD offers 'comparable programming' if it offers 'at least 12 channels of video programming, including at least one channel of nonbroadcast service programming'"); *Time Warner Entertainment-Advance/Newhouse Partnership*, 20 FCC Rcd 15709, n. 15 (Med. Bur. 2005) (Nineteen California Franchise Areas) ("the DBS providers offer well over 100 channels, most of which are non-broadcast channels," which satisfies the comparable programming criterion).

<sup>17</sup> See *The Helicon Group, L.P.*, 17 FCC Rcd 16636, n. 8 (Med. Bur. 2002) (Barnet, Vermont) ("While Charter did not provide in its Petition a copy of EchoStar's nationwide channel lineup, which is otherwise available at [www.dishnetwork.com](http://www.dishnetwork.com), we have consistently found that the programming of both DBS providers satisfies the programming compatibility component of the competing provider effective competition test.").

nonbroadcast and broadcast programming services available on Time Warner Cable’s system serving the Franchise Areas. The DBS Providers’ programming lineups amply demonstrate that at least twelve channels of video programming are offered, including at least one channel of nonbroadcast programming service.<sup>18</sup> Thus, the DBS Providers offer “comparable” multichannel video programming, as defined by the Commission, to actual and potential subscribers in the Franchise Areas.

**C. The DBS Providers Offer Comparable Multichannel Video Programming to More Than 50 Percent of the Households in the Franchise Areas.**

As noted above, at least one MVPD unaffiliated with the incumbent cable operator must offer comparable video programming to at least 50 percent of the households in a franchise area for the first prong of the 50/15 effective competition test to be met.<sup>19</sup> In numerous effective competition decisions, the Commission has concluded that the DBS Providers are deemed to satisfy this 50 percent threshold due to their nationwide satellite footprints.<sup>20</sup> Accordingly, since the DBS Providers offer comparable programming to greater than 50 percent of the households in the Franchise Areas, the first prong of the 50/15 effective competition test is satisfied.

**D. The Number of Households Subscribing to the Programming Services of Competing MVPDs Exceeds 15 Percent of the Households in the Franchise Areas.**

The subscriber base of any MVPD or MVPDs,<sup>21</sup> other than the largest MVPD, must exceed 15 percent of the households in a franchise area to meet the second prong of the 50/15 test. As demonstrated below, Time Warner Cable’s cable system meets this threshold with

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<sup>18</sup> The DBS Providers satisfy the program comparability standard regardless of whether they provide local-into-local service to the Franchise Area. *See Falcon Telecable*, 17 FCC Rcd 22842, ¶ 4 (Med. Bur. 2002) (Four Texas Communities) (“[T]he Commission’s effective competition program comparability standard does not include a local television programming component.”).

<sup>19</sup> See 47 C.F.R. § 76.905(b)(2)(i).

<sup>20</sup> See note 9.

<sup>21</sup> See *Time Warner Entertainment Co., L.P., et al. v. FCC*, 56 F.3d 151 (D.C. Cir. 1995) (holding that the subscribership of all MVPDs, other than the largest MVPD, may be aggregated to satisfy the 15 percent threshold). *See also* 47 C.F.R. § 76.905(f).

respect to the Franchise Areas.<sup>22</sup> Time Warner Cable is the largest MVPD in each of these Franchise Areas because it has the most video subscribers in each community.

Time Warner Cable has used the ZIP+4 methodology previously approved by the Commission in numerous decisions to calculate the DBS Providers' subscribership in the Franchise Areas.<sup>23</sup> Attached as Exhibit A is a report from Media Business Corp. ("MBC") which has identified all of the ZIP+4 zip codes that are encompassed, in whole or in part, by each of these Franchise Areas by using mapping software based on data derived from the U.S. Census Bureau and the U.S. Postal Service. Attached as Exhibit B are the Census 2010 occupied household figures for each of these Franchise Areas. Attached as Exhibit C are reports from the Satellite Broadcasting Communications Association ("SBCA"), which has been charged with the task of providing the required DBS Provider combined subscriber data for effective competition purposes, providing DBS Provider subscriber counts for each Franchise Area and each of the identified ZIP+4 zip codes. Based on this data and summarized in the following table, the DBS providers' subscriber penetration levels clearly exceed 15% in each of the Franchise Areas.

Community	DBS Provider Subscribership	2010 Census Occupied Households	DBS Provider Penetration
Bristol, Town of	417	958	43.53%
Silver Lake, Village of	152	908	16.74%
Twin Lakes, Village of	495	2345	21.11%

Consequently, Time Warner Cable has demonstrated that the second prong of the 50/15 effective competition test has been met for each of these Franchise Areas.

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<sup>22</sup> See attached Declaration of Celeste Flynn, Vice President of Governmental Relations – Wisconsin for Time Warner Cable.

<sup>23</sup> See, e.g., *Marcus Cable Associates, LLC d/b/a Charter Communications, Inc.*, DA 02-2174, 17 FCC Rcd 16652 (Media Bureau 2002) (Denton, Texas), aff'd 18 FCC Rcd 9762 (Media Bureau 2003); see also *Vicksburg Video, Inc. d/b/a Wehco Video, Inc.*, DA 02-2176, 17 FCC Rcd 16659 (Media Bureau 2002) (Vicksburg, Mississippi); *Kilgore Video, Inc. d/b/a Wehco Video, Inc.*, DA 02-2177, 17 FCC Rcd 16662 (Media Bureau 2002) (Kilgore, Texas); *Twelve Oregon Cities Order*.

## **CONCLUSION**

Because Time Warner Cable has demonstrated that it is subject to effective competition pursuant to Section 623(l)(1) of the Act and Section 76.905(b) of the Commission's rules for the above captioned Franchise Areas, Time Warner Cable respectfully requests that the Commission expeditiously find that Time Warner Cable's cable system serving the Franchise Areas is not subject to rate regulation as to basic cable service or other forms of rate regulation specified in 47 U.S.C. § 543 and revoke the LFAs' certification to regulate basic rates as appropriate.

Undersigned counsel has read the foregoing Petition, and to the best of such counsel's knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law, and is not interposed for any improper purpose.

Respectfully submitted,

**TIME WARNER CABLE INC.**

By:   
Craig A. Gilley

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1255 23rd Street, N.W.  
Eighth Floor  
Washington, D.C. 20037  
(202) 478-7370

Its Attorneys

Dated: May 18, 2012

**DECLARATION**

I, Celeste Flynn, hereby declare under penalty of perjury that:

1. I am the Vice President of Government Relations – Wisconsin for Time Warner Cable, the operator of the cable system that serves the specific Franchise Areas involved in the foregoing Petition for Special Relief (“Petition”).
2. I have read the foregoing Petition and am familiar with the contents thereof and the matters referred to therein.
3. I have reviewed Time Warner Cable’s respective cable subscriber numbers for each of the communities involved in the Petition, as well as the DBS subscriber numbers provided by SBCA and allocated to each as described in the Petition. Time Warner Cable is the largest multichannel video program provider serving each of the Franchise Areas.
4. The facts contained within the Petition are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Celeste Flynn

Date: 5/16/12

**EXHIBIT A**

**Media Business Corp. Zip Code Identification Report**

# Franchise & ZIP+4 Identification

## Data Documentation

Franchise: Cable operator's franchised service area

*Franchise boundary file vintage : County June 2011 (source : Dynamap), MCD June 2011 (source : Dynamap), Place June 2011 (source : Dynamap)*

*Vintage is the currency of the data as of a specific date and does not correspond exactly to the time of product release because of data-to-product production time.*

FIPS: One of a series of codes, issued by the National Institute of Standards and Technology (NIST), assigned for the purpose of ensuring uniform identification of geographic entities throughout all Federal Government programs and agencies.

Each officially recognized Census place has its own unique 5-10 digit identifier. For more information, please see <http://www.census.gov/geo/www/fips/fips.html>.

County: Census county in which the franchise resides

State: State in which the franchise resides

ZIP: United States Postal Service 5-digit ZIP code that covers, either in whole or in part, the cable operator's franchise area.

*ZIP Code boundary file vintage : September 2011 (source : Dynamap)*

*Vintage is the currency of the data as of a specific date and does not correspond exactly to the time of product release because of data-to-product production time.*

PLUS4: USPS +4 extension to the 5-digit ZIP code. Using geocoding technology, and using only +4s that could be determined to be entirely within the cable operator's franchise area, MBC determined that each of the ZIP+4s on the tab(s) included in this repo

ZIP4: 5-Digit USPS ZIP code and 4-digit extension.

*ZIP+4 boundary file vintage : September 2011 (source : Dynamap)*

*Vintage is the currency of the data as of a specific date and does not correspond exactly to the time of product release because of data-to-product production time.*

USPS Record Type: H - high-rise; F - firm; S - street; R - rural route/highway contract; P - post office box; G - general delivery.

\* Type H Records (High Rises, Buildings, Apartments) are assigned a ZIP+4 centroid based on the actual address. If a ZIP+4 centroid cannot be assigned, a ZIP+2 or 5-digit ZIP centroid is assigned.

\* Type F Records (Firms) are assigned a ZIP+4 centroid based on the actual address. If a ZIP+4 centroid cannot be assigned, a ZIP+2 or 5-digit centroid is assigned.

\* Type S Records (Streets) are assigned a ZIP+4 centroid that falls on an address range. If a ZIP+4 centroid cannot be assigned, a ZIP+2 or 5-digit centroid is assigned.

\* Type R Records (Rural Routes) are assigned ZIP+2 centroids if possible. In cases where this is not possible, a 5-digit centroid is assigned.

\* Type P (P.O. Box) and Type G (General Delivery Records) are assigned a 5-digit centroid.

ZIP Type: ZIP Type as defined by Dynamap. ZIP Type N = non-unique ZIP, P = PO Box, U= Unique ZIP, M= Military ZIP, G= Tele Atlas, Inc. (GDT, Inc.) ZIP (zero delivery area).

Centroid Type: Each record includes a centroid type code that indicates whether the ZIP+4 has been assigned a ZIP+4, ZIP+2 or 5-digit ZIP centroid.

\* ZIP+4 - 1

\* ZIP+2 - 2

\* 5-digit ZIP - 3

\* None - 0

Percent of ZIP in FIPS: The percentage of the ZIP code that is within the geography's borders.

Full ZIP4 coverage: 1 = all ZIP+4's of a ZIP code fall within the geography's borders. 0 = not all ZIP+4's of a ZIP code fall within the geography's borders.

Census 2010 HHS: Count of Census 2010 households by community. For Counties and Minor Civil Divisions (MCDs), HHS reflect count of community minus any incorporated areas within the larger franchise.















Bristol	Kenosha	WI	53194	0032	531940032
Bristol	Kenosha	WI	53194	0033	531940033
Bristol	Kenosha	WI	53194	0034	531940034
Bristol	Kenosha	WI	53194	0035	531940035
Bristol	Kenosha	WI	53194	0036	531940036
Bristol	Kenosha	WI	53194	0037	531940037
Bristol	Kenosha	WI	53194	0038	531940038
Bristol	Kenosha	WI	53194	0039	531940039
Bristol	Kenosha	WI	53194	0040	531940040
Bristol	Kenosha	WI	53194	0041	531940041
Bristol	Kenosha	WI	53194	0042	531940042
Bristol	Kenosha	WI	53194	0043	531940043
Bristol	Kenosha	WI	53194	0044	531940044
Bristol	Kenosha	WI	53194	0045	531940045
Bristol	Kenosha	WI	53194	0046	531940046
Bristol	Kenosha	WI	53194	0047	531940047
Bristol	Kenosha	WI	53194	0048	531940048
Bristol	Kenosha	WI	53194	0049	531940049
Bristol	Kenosha	WI	53194	0050	531940050
Bristol	Kenosha	WI	53194	0051	531940051
Bristol	Kenosha	WI	53194	0052	531940052
Bristol	Kenosha	WI	53194	0053	531940053
Bristol	Kenosha	WI	53194	0054	531940054
Bristol	Kenosha	WI	53194	0055	531940055
Bristol	Kenosha	WI	53194	0056	531940056
Bristol	Kenosha	WI	53194	0057	531940057
Bristol	Kenosha	WI	53194	0058	531940058
Bristol	Kenosha	WI	53194	0059	531940059
Bristol	Kenosha	WI	53194	0060	531940060
Bristol	Kenosha	WI	53194	0061	531940061
Bristol	Kenosha	WI	53194	0062	531940062
Bristol	Kenosha	WI	53194	3194	53194
Bristol	Kenosha	WI	53194	9400	5319400
Bristol	Kenosha	WI	53194	9498	5319498
Bristol	Kenosha	WI	53194	9499	5319499
Bristol	Kenosha	WI	53194	9800	531949800
Bristol	Kenosha	WI	53194	9998	531949988
Bristol	Kenosha	WI	53194	9999	531949999

















Silver Lake	Kenosha	WI	53170 1742	531701742
Silver Lake	Kenosha	WI	53170 1743	531701743
Silver Lake	Kenosha	WI	53170 1744	531701744
Silver Lake	Kenosha	WI	53170 1745	531701745
Silver Lake	Kenosha	WI	53170 2000	531702000
Silver Lake	Kenosha	WI	53170 3170	53170
Silver Lake	Kenosha	WI	53170 7000	53170000
Silver Lake	Kenosha	WI	53170 7001	53170001
Silver Lake	Kenosha	WI	53170 7002	53170002
Silver Lake	Kenosha	WI	53170 7003	53170003
Silver Lake	Kenosha	WI	53170 7004	53170004
Silver Lake	Kenosha	WI	53170 7005	53170005
Silver Lake	Kenosha	WI	53170 7006	53170006
Silver Lake	Kenosha	WI	53170 7007	53170007
Silver Lake	Kenosha	WI	53170 7008	53170008
Silver Lake	Kenosha	WI	53170 7009	53170009
Silver Lake	Kenosha	WI	53170 7010	53170100
Silver Lake	Kenosha	WI	53170 7011	53170111
Silver Lake	Kenosha	WI	53170 7012	53170121
Silver Lake	Kenosha	WI	53170 7013	53170131
Silver Lake	Kenosha	WI	53170 7014	53170141
Silver Lake	Kenosha	WI	53170 7015	53170151
Silver Lake	Kenosha	WI	53170 7016	53170161
Silver Lake	Kenosha	WI	53170 7017	53170171
Silver Lake	Kenosha	WI	53170 7020	53170200
Silver Lake	Kenosha	WI	53170 7098	5317098
Silver Lake	Kenosha	WI	53170 7099	5317099
Silver Lake	Kenosha	WI	53170 9891	531709891
Silver Lake	Kenosha	WI	53170 9998	531709998
Silver Lake	Kenosha	WI	53170 9999	531709999
Silver Lake	Kenosha	WI	53170 9518	531709518

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Twin Lakes	Kenosha	WI	53181 1016	531811016	Twin Lakes	Kenosha	WI	53181 8805	531818805
Twin Lakes	Kenosha	WI	53181 1017	531811017	Twin Lakes	Kenosha	WI	53181 8806	531818806
Twin Lakes	Kenosha	WI	53181 1018	531811018	Twin Lakes	Kenosha	WI	53181 8807	531818807
Twin Lakes	Kenosha	WI	53181 1019	531811019	Twin Lakes	Kenosha	WI	53181 8808	531818808
Twin Lakes	Kenosha	WI	53181 1020	531811020	Twin Lakes	Kenosha	WI	53181 8809	531818809
Twin Lakes	Kenosha	WI	53181 1021	531811021	Twin Lakes	Kenosha	WI	53181 8810	531818810
Twin Lakes	Kenosha	WI	53181 1022	531811022	Twin Lakes	Kenosha	WI	53181 8811	531818811
Twin Lakes	Kenosha	WI	53181 1023	531811023	Twin Lakes	Kenosha	WI	53181 8812	531818812
Twin Lakes	Kenosha	WI	53181 1024	531811024	Twin Lakes	Kenosha	WI	53181 8900	531818900
Twin Lakes	Kenosha	WI	53181 1025	531811025	Twin Lakes	Kenosha	WI	53181 8901	531818901
Twin Lakes	Kenosha	WI	53181 1026	531811026	Twin Lakes	Kenosha	WI	53181 8902	531818902
Twin Lakes	Kenosha	WI	53181 1027	531811027	Twin Lakes	Kenosha	WI	53181 8903	531818903
Twin Lakes	Kenosha	WI	53181 1028	531811028	Twin Lakes	Kenosha	WI	53181 8904	531818904
Twin Lakes	Kenosha	WI	53181 1029	531811029	Twin Lakes	Kenosha	WI	53181 8905	531818905
Twin Lakes	Kenosha	WI	53181 1030	531811030	Twin Lakes	Kenosha	WI	53181 8908	531818908
Twin Lakes	Kenosha	WI	53181 1031	531811031	Twin Lakes	Kenosha	WI	53181 8909	531818909
Twin Lakes	Kenosha	WI	53181 1032	531811032	Twin Lakes	Kenosha	WI	53181 8910	531818910
Twin Lakes	Kenosha	WI	53181 2000	531812000	Twin Lakes	Kenosha	WI	53181 8912	531818912
Twin Lakes	Kenosha	WI	53181 3181	53181	Twin Lakes	Kenosha	WI	53181 8913	531818913
Twin Lakes	Kenosha	WI	53181 8100	5318100	Twin Lakes	Kenosha	WI	53181 8914	531818914
Twin Lakes	Kenosha	WI	53181 8101	5318101	Twin Lakes	Kenosha	WI	53181 8915	531818915
Twin Lakes	Kenosha	WI	53181 8102	5318102	Twin Lakes	Kenosha	WI	53181 8916	531818916
Twin Lakes	Kenosha	WI	53181 8103	5318103	Twin Lakes	Kenosha	WI	53181 8917	531818917
Twin Lakes	Kenosha	WI	53181 8104	5318104	Twin Lakes	Kenosha	WI	53181 8918	531818918
Twin Lakes	Kenosha	WI	53181 8105	5318105	Twin Lakes	Kenosha	WI	53181 8919	531818919
Twin Lakes	Kenosha	WI	53181 8106	5318106	Twin Lakes	Kenosha	WI	53181 8920	531818920
Twin Lakes	Kenosha	WI	53181 8107	5318107	Twin Lakes	Kenosha	WI	53181 8921	531818921
Twin Lakes	Kenosha	WI	53181 8108	5318108	Twin Lakes	Kenosha	WI	53181 8922	531818922
Twin Lakes	Kenosha	WI	53181 8109	5318109	Twin Lakes	Kenosha	WI	53181 8923	531818923
Twin Lakes	Kenosha	WI	53181 8110	5318110	Twin Lakes	Kenosha	WI	53181 8924	531818924
Twin Lakes	Kenosha	WI	53181 8120	5318120	Twin Lakes	Kenosha	WI	53181 8925	531818925
Twin Lakes	Kenosha	WI	53181 8188	5318188	Twin Lakes	Kenosha	WI	53181 8926	531818926
Twin Lakes	Kenosha	WI	53181 8189	5318189	Twin Lakes	Kenosha	WI	53181 8927	531818927
Twin Lakes	Kenosha	WI	53181 8191	5318191	Twin Lakes	Kenosha	WI	53181 8928	531818928
Twin Lakes	Kenosha	WI	53181 8192	5318192	Twin Lakes	Kenosha	WI	53181 8929	531818929
Twin Lakes	Kenosha	WI	53181 8193	5318193	Twin Lakes	Kenosha	WI	53181 8930	531818930
Twin Lakes	Kenosha	WI	53181 8194	5318194	Twin Lakes	Kenosha	WI	53181 8931	531818931
Twin Lakes	Kenosha	WI	53181 8195	5318195	Twin Lakes	Kenosha	WI	53181 8932	531818932
Twin Lakes	Kenosha	WI	53181 8196	5318196	Twin Lakes	Kenosha	WI	53181 8933	531818933
Twin Lakes	Kenosha	WI	53181 8197	5318197	Twin Lakes	Kenosha	WI	53181 8934	531818934
Twin Lakes	Kenosha	WI	53181 8198	5318198	Twin Lakes	Kenosha	WI	53181 8935	531818935
Twin Lakes	Kenosha	WI	53181 8199	5318199	Twin Lakes	Kenosha	WI	53181 8936	531818936
Twin Lakes	Kenosha	WI	53181 8800	531818800	Twin Lakes	Kenosha	WI	53181 9000	531819000
Twin Lakes	Kenosha	WI	53181 8801	531818801	Twin Lakes	Kenosha	WI	53181 9001	531819001
Twin Lakes	Kenosha	WI	53181 8802	531818802	Twin Lakes	Kenosha	WI	53181 9002	531819002
Twin Lakes	Kenosha	WI	53181 8803	531818803	Twin Lakes	Kenosha	WI	53181 9003	531819003
Twin Lakes	Kenosha	WI	53181 8804	531818804	Twin Lakes	Kenosha	WI	53181 9039	531819039





Twin Lakes	Kenosha	WI	53181 9734	531819734	Twin Lakes	Kenosha	WI	53181 9781	531819781
Twin Lakes	Kenosha	WI	53181 9735	531819735	Twin Lakes	Kenosha	WI	53181 9782	531819782
Twin Lakes	Kenosha	WI	53181 9736	531819736	Twin Lakes	Kenosha	WI	53181 9783	531819783
Twin Lakes	Kenosha	WI	53181 9737	531819737	Twin Lakes	Kenosha	WI	53181 9784	531819784
Twin Lakes	Kenosha	WI	53181 9738	531819738	Twin Lakes	Kenosha	WI	53181 9785	531819785
Twin Lakes	Kenosha	WI	53181 9739	531819739	Twin Lakes	Kenosha	WI	53181 9786	531819786
Twin Lakes	Kenosha	WI	53181 9740	531819740	Twin Lakes	Kenosha	WI	53181 9787	531819787
Twin Lakes	Kenosha	WI	53181 9741	531819741	Twin Lakes	Kenosha	WI	53181 9788	531819788
Twin Lakes	Kenosha	WI	53181 9742	531819742	Twin Lakes	Kenosha	WI	53181 9789	531819789
Twin Lakes	Kenosha	WI	53181 9743	531819743	Twin Lakes	Kenosha	WI	53181 9790	531819790
Twin Lakes	Kenosha	WI	53181 9744	531819744	Twin Lakes	Kenosha	WI	53181 9791	531819791
Twin Lakes	Kenosha	WI	53181 9745	531819745	Twin Lakes	Kenosha	WI	53181 9792	531819792
Twin Lakes	Kenosha	WI	53181 9746	531819746	Twin Lakes	Kenosha	WI	53181 9793	531819793
Twin Lakes	Kenosha	WI	53181 9747	531819747	Twin Lakes	Kenosha	WI	53181 9794	531819794
Twin Lakes	Kenosha	WI	53181 9748	531819748	Twin Lakes	Kenosha	WI	53181 9795	531819795
Twin Lakes	Kenosha	WI	53181 9749	531819749	Twin Lakes	Kenosha	WI	53181 9796	531819796
Twin Lakes	Kenosha	WI	53181 9750	531819750	Twin Lakes	Kenosha	WI	53181 9797	531819797
Twin Lakes	Kenosha	WI	53181 9751	531819751	Twin Lakes	Kenosha	WI	53181 9798	531819798
Twin Lakes	Kenosha	WI	53181 9752	531819752	Twin Lakes	Kenosha	WI	53181 9799	531819799
Twin Lakes	Kenosha	WI	53181 9753	531819753	Twin Lakes	Kenosha	WI	53181 9800	531819800
Twin Lakes	Kenosha	WI	53181 9754	531819754	Twin Lakes	Kenosha	WI	53181 9801	531819801
Twin Lakes	Kenosha	WI	53181 9755	531819755	Twin Lakes	Kenosha	WI	53181 9802	531819802
Twin Lakes	Kenosha	WI	53181 9756	531819756	Twin Lakes	Kenosha	WI	53181 9803	531819803
Twin Lakes	Kenosha	WI	53181 9757	531819757	Twin Lakes	Kenosha	WI	53181 9804	531819804
Twin Lakes	Kenosha	WI	53181 9758	531819758	Twin Lakes	Kenosha	WI	53181 9805	531819805
Twin Lakes	Kenosha	WI	53181 9759	531819759	Twin Lakes	Kenosha	WI	53181 9806	531819806
Twin Lakes	Kenosha	WI	53181 9760	531819760	Twin Lakes	Kenosha	WI	53181 9807	531819807
Twin Lakes	Kenosha	WI	53181 9761	531819761	Twin Lakes	Kenosha	WI	53181 9808	531819808
Twin Lakes	Kenosha	WI	53181 9762	531819762	Twin Lakes	Kenosha	WI	53181 9809	531819809
Twin Lakes	Kenosha	WI	53181 9763	531819763	Twin Lakes	Kenosha	WI	53181 9810	531819810
Twin Lakes	Kenosha	WI	53181 9764	531819764	Twin Lakes	Kenosha	WI	53181 9811	531819811
Twin Lakes	Kenosha	WI	53181 9765	531819765	Twin Lakes	Kenosha	WI	53181 9812	531819812
Twin Lakes	Kenosha	WI	53181 9766	531819766	Twin Lakes	Kenosha	WI	53181 9813	531819813
Twin Lakes	Kenosha	WI	53181 9767	531819767	Twin Lakes	Kenosha	WI	53181 9998	531819998
Twin Lakes	Kenosha	WI	53181 9768	531819768	Twin Lakes	Kenosha	WI	53181 9999	531819999
Twin Lakes	Kenosha	WI	53181 9769	531819769					
Twin Lakes	Kenosha	WI	53181 9770	531819770					
Twin Lakes	Kenosha	WI	53181 9771	531819771					
Twin Lakes	Kenosha	WI	53181 9772	531819772					
Twin Lakes	Kenosha	WI	53181 9773	531819773					
Twin Lakes	Kenosha	WI	53181 9774	531819774					
Twin Lakes	Kenosha	WI	53181 9775	531819775					
Twin Lakes	Kenosha	WI	53181 9776	531819776					
Twin Lakes	Kenosha	WI	53181 9777	531819777					
Twin Lakes	Kenosha	WI	53181 9778	531819778					
Twin Lakes	Kenosha	WI	53181 9779	531819779					
Twin Lakes	Kenosha	WI	53181 9780	531819780					

**EXHIBIT B**

**2010 Census Household Population**

GCT-PL2 - Wisconsin: Population and  
Housing Occupancy Status: 2010 - State --  
Place

2010 Census Redistricting Data (Public  
Law 94-171) Summary File

NOTE: For information on confidentiality  
protection, nonsampling error, and  
definitions, see  
<http://www.census.gov/prod/cen2010/pl94-171.pdf>

NOTE: Change to the  
California, Connecticut, Mississippi, New  
Hampshire, Virginia, and Washington P. L.  
94-171 Summary Files as delivered.

Geographic area	Total	Housing units		
		Total	Occupied	Vacant
Wisconsin	5,686,986	2,624,358	2,279,768	344,590
Silver Lake village	2,411	1,072	908	164
Bristol town	2,330	1,063	958	105
Twin Lakes village	5,989	3,251	2,345	906